## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS **HOUSTON DIVISION**

\*

IN RE MIDWAY OILFIELD **CASE NO. 18-34567** 

CONSTRUCTORS, INC.

dba MIDWAY ENERGY SERVICES **CHAPTER 11** 

> DEBTOR. \* **JUDGE MARVIN ISGUR**

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## NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that Buffalo Gap Instrumentation & Electrical Co., Inc. ("Buffalo Gap") hereby appears through its counsel, Benjamin W. Kadden and the law firm of Lugenbuhl, Wheaton, Peck, Rankin & Hubbard ("Counsel"). Counsel hereby enters its appearance pursuant to section 1109(b) of Title 11 of the United States Code (the "Bankruptcy Code") and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and request that each of the undersigned be added to the official mailing matrix and service lists in the abovecaptioned Chapter 11 case. Counsel request, pursuant to Bankruptcy Rules 2002, 3017, and 9007 and section 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or required to be given in these Chapter 11 cases and copies of all papers served or required to be served in these Chapter 11 cases, including but not limited to, all notices (including those required by Bankruptcy Rule 2002), reports, pleadings, motions, applications, lists, schedules, statements, Chapter 11 plans, disclosure statements and all other matters arising herein or in any related adversary proceeding, at the addresses, telephone, and email addresses set forth below:

> Buffalo Gap Instrumentation & Electrical Co., Inc. Attn: Benjamin W. Kadden Lugenbuhl, Wheaton, Peck, Rankin & Hubbard 601 Poydras St., Suite 2775 New Orleans, LA 70130

Telephone: (504) 568-1990

Facsimile: (504) 310-9195

E-mail: bkadden@lawla.com

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy

Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy

Rules specified above, but also includes, without limitation, orders and notices of any application,

complaint or demand, motion, petition, pleading or request, and answering or reply papers filed in

these cases, whether formal or informal, written or oral, and whether served, transmitted or

conveyed by mail, email, hand delivery, telephone, telegraph, telex or otherwise filed or made with

regard to the above-captioned Chapter 11 cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for

Notice Pursuant to Fed. R. Bankr. P. 2002 shall not be deemed or construed to be a waiver of any

of the rights of Express Supply, including, without limitation, to (i) request that final orders in non-

core proceedings be entered only after de novo review by a higher court; (ii) demand trial by jury

in any proceeding in this case, or any case, controversy, or adversary proceeding related to this

case; (iii) request withdrawal of the reference in any matter subject to mandatory or discretionary

withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which

Buffalo Gap may be entitled in law or in equity, all of which rights, claims, actions, defenses,

setoffs, and recoupments are expressly reserved and not waived.

Respectfully Submitted,

LUGENBUHL, WHEATON, PECK, RANKIN & HUBBARD

/s/ Benjamin W. Kadden

BENJAMIN W. KADDEN

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Counsel for Buffalo Gap Instrumentation &

Electrical Co., Inc.

2

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served a true and correct copy of the Notice of Appearance and Request for Notices via Notice of Electronic Filing on this 17<sup>th</sup> day of August, 2018.

/s/ Benjamin W. Kadden